

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

*EDWARD SENCLAIR,***Plaintiff,****v.***GIGG EXPRESS, INC.; and RAVEESH,***Defendants.**§
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§
§
§
§
§**CIVIL ACTION NO. 3:21-CV- 1401**

**INDEX OF STATE COURT PLEADINGS FILED WITH
DEFENDANT GIGG EXPRESS, INC.'S NOTICE OF REMOVAL**

Defendant, GIGG Express, Inc. ("Defendant") hereby submits its Index of State Court Pleadings filed as of the date Defendant filed its Notice of Removal:

Ex. No.	Document Filed	Filing Party	Date Filed
1	Docket Sheet – State Court	Clerk	June 14, 2021
2	Plaintiff's Original Petition	Plaintiff	May 10, 2021
3	Civil Case Information Sheet	Plaintiff	May 10, 2021
4	Correspondence Requesting Service of Process	Plaintiff	May 12, 2021
5	Attachment to correspondence	Clerk	May 12, 2021
6	Jury Demand	Plaintiff	May 12, 2021
7	Status Conference Order	Court	May 12, 2021
8	Issue Citation – Gigg Express Inc.	Clerk	May 12, 2021
9	Letter approving fee	Plaintiff	May 19 2021

Respectfully submitted,

/s/ Jeffrey O. Marshall

Jeffrey O. Marshall (TSBN 00797005)

jeff.marshall@wilsonelser.com

Jesse R. Showalter (TSBN 24086800)

jesse.showalter@wilsonelser.com

**WILSON ELSE MOSKOWITZ
EDELMAN & DICKER, LLP**

901 Main Street, Suite 4800

Dallas, TX 75202

(214) 698-8000 - telephone

(214) 698-1101 – telecopier

**ATTORNEYS FOR DEFENDANT GIGG
EXPRESS, INC.**

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of *Index of State Court Pleadings Filed with Defendant Gigg Express, Inc.'s Notice of Removal* was electronically filed with the Court on June 15, 2021. Notice of this filing will be sent by operation of the Court's case management and electronic case filing system.

/s/ Jeffrey O. Marshall

JEFFREY O. MARSHALL

EXHIBIT 1

Case Information

DC-21-05961 | EDWARD SENCLAIR vs. GIGG EXPRESS, INC, et al

Case Number

DC-21-05961

File Date

05/10/2021

Court

44th District Court

Case Type

MOTOR VEHICLE ACCIDENT

Judicial Officer

WYSOCKI, ASHLEY

Case Status

OPEN

Party

PLAINTIFF

SENCLAIR, EDWARD

Active Attorneys ▼

Lead Attorney

RIOJAS, ROBERT E

Retained

DEFENDANT

GIGG EXPRESS, INC

Address

PROCESS AGENT SERVICE COMPANY. INC

JEFFERY SCHULTZ

1221 MCKINNEY SUITE 4300

HOUSTON TX 77010

DEFENDANT

RAVEESH, UNKNOWN

Address

J. BRUCE BUGG, JR. CHAIRMAN TEXAS TRANS. COMMISSION

125 E. 11TH STREET

AUSTIN TX 78701-2483

Events and Hearings

05/10/2021 NEW CASE FILED (OCA) - CIVIL
05/10/2021 ORIGINAL PETITION ▼ ORIGINAL PETITION
05/10/2021 CASE FILING COVER SHEET ▼ COVER SHEET
05/12/2021 REQUEST FOR SERVICE ▼ CORRESPONDENCE LETTER 20210511142950.pdf
05/12/2021 JURY DEMAND ▼ JURY DEMAND
05/12/2021 ORDER - STATUS CONFERENCE ▼ ORDER - STATUS CONFERENCE
05/12/2021 ISSUE CITATION ▼ ISSUE CITATION- GIGG EXPRESS INC Comment ESERVE
05/19/2021 ISSUE CITATION COMM OF INS OR SOS
05/19/2021 CORRESPONDENCE - LETTER TO FILE ▼ CORRESPONDENCE LETTER
05/19/2021 CITATION ▼ Unserved Anticipated Server ESERVE Anticipated Method Comment

GIGG EXPRESS INC
05/25/2021 CITATION SOS/COI/COH/HAG ▼
Unservd
Anticipated Server
ESERVE
Anticipated Method
Comment
RAVEESH
06/25/2021 Status Conference ▼
Judicial Officer
WYSOCKI, ASHLEY
Hearing Time
9:00 AM
Comment
EMAILED P 5/12, CIT NOT PAID FOR

Financial

SENCLAIR, EDWARD

Total Financial Assessment				\$352.00
Total Payments and Credits				\$352.00
5/10/2021	Transaction Assessment			\$292.00
5/10/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 29163-2021-DCLK	SENCLAIR, EDWARD	(\$292.00)
5/13/2021	Transaction Assessment			\$16.00
5/13/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 29986-2021-DCLK	SENCLAIR, EDWARD	(\$16.00)
5/13/2021	Transaction Assessment			\$40.00
5/13/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 30214-2021-DCLK	SENCLAIR, EDWARD	(\$40.00)
5/21/2021	Transaction Assessment			\$4.00
5/21/2021				(\$4.00)

CREDIT CARD - TEXFILE Receipt # 32025-
(DC) 2021-DCLK

SENCLAIR,
EDWARD

Documents

ORIGINAL PETITION
COVER SHEET
CORRESPONDENCE LETTER
20210511142950.pdf
JURY DEMAND
ORDER - STATUS CONFERENCE
ISSUE CITATION- GIGG EXPRESS INC
CORRESPONDENCE LETTER

EXHIBIT 2CAUSE NO. DC-21-05961

EDWARD SENCLAIR,)	
)	DALLAS COUNTY, TEXAS
Plaintiff,)	
)	44th
vs.)	JUDICIAL DISTRICT COURT
)	
GIGG EXPRESS, INC., and)	
RAVEESH,)	(JURY DEMANDED)
)	
Defendants.)	

PLAINTIFF'S ORIGINAL PETITION

TO THE COURT:

COMES NOW Plaintiff EDWARD SENCLAIR, by and through his attorney of record, Robert E. Riojas, Riojas Law Firm, P.C., and files this Original Petition against GIGG EXPRESS, INC., and RAVEESH, and in support of the same would show as follows.

I.
Parties

1. Plaintiff EDWARD SENCLAIR is a resident of the County of El Paso, State of Texas. The last three numbers of Plaintiff's Texas driver's license are: 302. The last three digits of Plaintiff's Social Security Number are: 324.
2. Defendant GIGG EXPRESS, INC. is a foreign business entity conducting commercial trucking operations in the State of Texas, operating under U.S. DOT 2012062. It can be served by serving its registered agent:

Process Agent Service Company, Inc. c/o Jeffery Schultz
1221 McKinney Suite 4300
Houston, TX 77010

3. Defendant RAVEESH is an individual who, upon information and belief, is a foreign resident. At the time of the accident made the basis of this suit, he had entered into the State of

Texas as a commercial truck driver. Thus, pursuant to Texas Civil Practice and Remedies Code, Section 17.061 et seq., the Chair of the Texas Transportation Commission is the agent for service of process on Raveesh:

J. Bruce Bugg, Jr., Chairman
Texas Transportation Commission
125 E. 11th Street
Austin, Texas 78701-2483

The Chairman is then requested to forward such service on Raveesh at:

62 Saintsbury Cres,
Brampton, ON L6R2V8
Canada

II.
Jurisdiction

4. This court is the proper venue because Dallas County, Texas is the county where the accident made the basis of this claim occurred. As a proximate result of said incident, damages in excess of the minimum jurisdictional limits of this Court were incurred by Plaintiff. Pursuant to Tex. R. Civ. P 47, Plaintiff states that he seeks monetary relief over \$1,000,000.00.

III.
Statement of Facts

5. On or about May 17, 2019, at approximately 11:00 a.m., Plaintiff SENCLAIR was sitting inside his truck, parked at a "Flying J" truck stop in Dallas County, Texas. While parked in a designated parking spot at said truck stop, he was suddenly and violently struck by a tractor-trailer owned and/or operated by Defendant GIGG EXPRESS, INC., and driven by its employee /agent, RAVEESH.

6. The collision and crash resulted in damages to the vehicle driven by Plaintiff and physical injuries to Plaintiff for which he sues.

IV.

Cause of Action: Negligence

7. Plaintiff re-alleges all of the foregoing and asserts that the conduct of Defendant RAVEESH constitutes negligence. Defendant and its agent, RAVEESH, owed Plaintiff and others the duty to operate their motor vehicle in a safe and prudent manner. Defendant RAVEESH breached such duty in one or more of the following ways:

- a. Failing to timely apply his brakes to avoid the collision;
- b. Failing to control his speed;
- c. Driving at a speed unsafe for the area of the collision;
- d. Failing to keep a safe and proper lookout;
- e. Failing to make a safe turn of his truck;
- f. Failing to keep a safe distance between his vehicle and Plaintiff's; and
- g. Striking Plaintiff's vehicle.

8. Because RAVEESH was an employee of Defendant GIGG EXPRESS INC. and engaged in work duties at the time of the accident described herein, Defendant GIGG EXPRESS INC is vicariously liable for RAVEESH's negligent conduct.

9. In addition to all of the foregoing, upon information and belief, it is asserted that RAVEESH was not properly trained and supervised by Defendant GIGG; that he was unfit to perform the driving tasks that he had been assigned. RAVEESH was still under training and not properly being observed and supervised at the time of the collision. GIGG failed to ensure that RAVEESH was a qualified and safe driver and was negligent in its hiring of him.

V.

Damages

10. Such negligence described above was the proximate cause of Plaintiff's injuries which

include physical pain and suffering, mental anguish, physical impairment, loss of earning capacity, and disfigurement all in past and future. Plaintiff sustained medical expenses in the past for which he seeks compensation. In addition, Plaintiff will likely incur medical expenses in the future, for which he also seeks compensation.

VI.
Right to Amend

11. Plaintiff reserves the right to further amend this Petition as discovery is undertaken and more facts becomes known.

VII..
Jury Demand

12. Plaintiff respectfully demands his right to have a trial by jury of 12 persons.

VIII.
Conclusion and Prayer

WHEREFORE, Plaintiff EDWARD SENCLAIR requests Defendants GIGG EXPRESS INC., and RAVEESH to be cited to appear and answer, and that on final trial, Plaintiff have judgment against Defendants as follows:

- a. actual damages in a sum within the jurisdictional limits of the court;
- b. prejudgment interest as provided by law;
- c. post-judgment interest as provided by law;
- d. costs of suit; and
- e. such other and further relief to which Plaintiff may be justly entitled.

Plaintiff reserves the right to amend and/or modify this Petition as necessary or appropriately after additional or further discovery is completed in this matter.

Respectfully Submitted,

RIOJAS LAW FIRM, P.C.

[s] Robert E. Riojas

By: Robert E. Riojas
Bar No. 00791531
2035 Grant Avenue
El Paso, Texas 79930-1016
Telephone: (915)301-7819
Facsimile: (915)759-8665
Email: rriojas@riojaslawfirm.net

EXHIBIT 3**CIVIL CASE INFORMATION SHEET**

Case 3:21-cv-01401-S Document 196 Filed 06/15/21 Page 12 of 24 PageID 17

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

FELICIA PITRE

DISTRICT CLERK


DALLAS CO. TEXAS

ALICIA MATA DEPUTY

STYLED Edward Senclair vs. GIGG Express, Inc., and Raveesh

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:		Person or entity completing sheet is:	
Name:	Email:	Plaintiff(s)/Petitioner(s):		<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner	
Robert E. Riojas	rriojas@riojaslawfirm.net	Edward Senclair		<input type="checkbox"/> Pro Se Plaintiff/Petitioner	
Address:	Telephone:	Defendant(s)/Respondent(s):		Additional Parties in Child Support Case:	
2035 Grant Ave.	(915) 301-7819	GIGG Express, Inc., and Raveesh		Custodial Parent:	
City/State/Zip:	Fax:			Non-Custodial Parent:	
El Paso, TX 79930	(915) 759-8665			Presumed Father:	
Signature: 	State Bar No:				
	00791531				
[Attach additional page as necessary to list all parties]					
2. Indicate case type, or identify the most important issue in the case (select only 1):					
Civil			Family Law		
Contract	Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)	
Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	<input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
Employment	Other Civil				
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____	<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____				
Tax	Probate & Mental Health				
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____	Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____				
3. Indicate procedure or remedy, if applicable (may select more than 1):					
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover	
4. Indicate damages sought (do not select if it is a family law case):					
<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input checked="" type="checkbox"/> Over \$1,000,000					

THE RIOJAS LAW FIRM, P.C.
A Professional Corporation

Robert E. Riojas
Licensed in Texas and New Mexico

2035 Grant Ave.
El Paso, Texas 79930
Telephone: (915) 301-7819
Telecopier: (915) 759-8665
Email: rriojas@riojaslawfirm.net

May 12, 2021

To: Dallas County District Clerk **VIA E-FILE**

Re: Request for Issuance of Citation

Style: *Edward Senclair vs. GIGG Express Inc. and Raveesh*
Cause No. DC2105961 in the 44th Judicial District Court;
Dallas County, Texas.

Attn: Clerk of the Court:

This office represents the Plaintiff in this case. We are requesting issuance of a citation in the above-referenced case. A file-stamped copy of the Petition is attached. The parties being served, and for which issuance is requested is:

Process Agent Service Company, Inc. c/o Jeffery Schultz
1221 McKinney
Suite 4300
Houston, TX 77010

And

Raveesh c/o
J. Bruce Bugg Jr., Chairman
Texas Transportation Commission
125 E. 11th Street
Austin, TX 78701-2483

The requested service can be mailed to the address above. Our office will then have a process server serve the citation. Due to COVID-19 restrictions, please email our office copies of the requested documentation. Please notify me of any associated fees.

Sincerely,

By: /s/ Robert E. Riojas
Robert E. Riojas
Attorney for Plaintiff

rriojas@riojaslawfirm.net
State Bar No. 00791531
2035 Grant Avenue
El Paso, Texas 79930
Telephone (915) 301-7819
Facsimile (915) 759-8665

EXHIBIT 5

DC-21-05961

CAUSE NO. _____

EDWARD SENCLAIR,)	
)	DALLAS COUNTY, TEXAS
Plaintiff,)	
)	44th
vs.)	_____ JUDICIAL DISTRICT COURT
)	
GIGG EXPRESS, INC., and)	
RAVEESH,)	(JURY DEMANDED)
)	
Defendants.)	

PLAINTIFF'S ORIGINAL PETITION

TO THE COURT:

COMES NOW Plaintiff EDWARD SENCLAIR, by and through his attorney of record, Robert E. Riojas, Riojas Law Firm, P.C., and files this Original Petition against GIGG EXPRESS, INC., and RAVEESH, and in support of the same would show as follows.

I.
Parties

1. Plaintiff EDWARD SENCLAIR is a resident of the County of El Paso, State of Texas. The last three numbers of Plaintiff's Texas driver's license are: 302. The last three digits of Plaintiff's Social Security Number are: 324.

2. Defendant GIGG EXPRESS, INC. is a foreign business entity conducting commercial trucking operations in the State of Texas, operating under U.S. DOT 2012062. It can be served by serving its registered agent:

Process Agent Service Company, Inc. c/o Jeffery Schultz
1221 McKinney Suite 4300
Houston, TX 77010

3. Defendant RAVEESH is an individual who, upon information and belief, is a foreign resident. At the time of the accident made the basis of this suit, he had entered into the State of

Texas as a commercial truck driver. Thus, pursuant to Texas Civil Practice and Remedies Code, Section 17.061 et seq., the Chair of the Texas Transportation Commission is the agent for service of process on Raveesh:

J. Bruce Bugg, Jr., Chairman
Texas Transportation Commission
125 E. 11th Street
Austin, Texas 78701-2483

The Chairman is then requested to forward such service on Raveesh at:

62 Saintsbury Cres,
Brampton, ON L6R2V8
Canada

II.
Jurisdiction

4. This court is the proper venue because Dallas County, Texas is the county where the accident made the basis of this claim occurred. As a proximate result of said incident, damages in excess of the minimum jurisdictional limits of this Court were incurred by Plaintiff. Pursuant to Tex. R. Civ. P 47, Plaintiff states that he seeks monetary relief over \$1,000,000.00.

III.
Statement of Facts

5. On or about May 17, 2019, at approximately 11:00 a.m., Plaintiff SENCLAIR was sitting inside his truck, parked at a "Flying J" truck stop in Dallas County, Texas. While parked in a designated parking spot at said truck stop, he was suddenly and violently struck by a tractor-trailer owned and/or operated by Defendant GIGG EXPRESS, INC., and driven by its employee /agent, RAVEESH.

6. The collision and crash resulted in damages to the vehicle driven by Plaintiff and physical injuries to Plaintiff for which he sues.

IV.

Cause of Action: Negligence

7. Plaintiff re-alleges all of the foregoing and asserts that the conduct of Defendant RAVEESH constitutes negligence. Defendant and its agent, RAVEESH, owed Plaintiff and others the duty to operate their motor vehicle in a safe and prudent manner. Defendant RAVEESH breached such duty in one or more of the following ways:

- a. Failing to timely apply his brakes to avoid the collision;
- b. Failing to control his speed;
- c. Driving at a speed unsafe for the area of the collision;
- d. Failing to keep a safe and proper lookout;
- e. Failing to make a safe turn of his truck;
- f. Failing to keep a safe distance between his vehicle and Plaintiff's; and
- g. Striking Plaintiff's vehicle.

8. Because RAVEESH was an employee of Defendant GIGG EXPRESS INC. and engaged in work duties at the time of the accident described herein, Defendant GIGG EXPRESS INC is vicariously liable for RAVEESH's negligent conduct.

9. In addition to all of the foregoing, upon information and belief, it is asserted that RAVEESH was not properly trained and supervised by Defendant GIGG; that he was unfit to perform the driving tasks that he had been assigned. RAVEESH was still under training and not properly being observed and supervised at the time of the collision. GIGG failed to ensure that RAVEESH was a qualified and safe driver and was negligent in its hiring of him.

V.

Damages

10. Such negligence described above was the proximate cause of Plaintiff's injuries which

include physical pain and suffering, mental anguish, physical impairment, loss of earning capacity, and disfigurement all in past and future. Plaintiff sustained medical expenses in the past for which he seeks compensation. In addition, Plaintiff will likely incur medical expenses in the future, for which he also seeks compensation.

VI.
Right to Amend

11. Plaintiff reserves the right to further amend this Petition as discovery is undertaken and more facts becomes known.

VII.
Jury Demand

12. Plaintiff respectfully demands his right to have a trial by jury of 12 persons.

VIII.
Conclusion and Prayer

WHEREFORE, Plaintiff EDWARD SENCLAIR requests Defendants GIGG EXPRESS INC., and RAVEESH to be cited to appear and answer, and that on final trial, Plaintiff have judgment against Defendants as follows:

- a. actual damages in a sum within the jurisdictional limits of the court;
- b. prejudgment interest as provided by law;
- c. post-judgment interest as provided by law;
- d. costs of suit; and
- e. such other and further relief to which Plaintiff may be justly entitled.

Plaintiff reserves the right to amend and/or modify this Petition as necessary or appropriately after additional or further discovery is completed in this matter.

Respectfully Submitted,

RIOJAS LAW FIRM, P.C.

[s] Robert E. Riojas

By: Robert E. Riojas
Bar No. 00791531
2035 Grant Avenue
El Paso, Texas 79930-1016
Telephone: (915)301-7819
Facsimile: (915)759-8665
Email: rriojas@riojaslawfirm.net

THE RIOJAS LAW FIRM, P.C.
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El Paso, Texas 79930
Telephone: (915)301-7819
Telecopier: (915)759-8665
rriojas@riojaslawfirm.net

May 12, 2021

To: Dallas County District Clerk **VIA E-FILE**

Re: Request for Jury Demand

Style: *Edward Senclair vs. GIGG Express Inc. and Raveesh;*
Cause No. DC2105961 in the 44th Judicial District Court;
Dallas County, Texas.

Attn: Clerk of the Court:

This letter is to confirm our office's request for jury demand in the above-mentioned case. The corresponding payment will be enclosed upon our e-filing of this letter.

Of course, please call if you have any questions.

Sincerely,

By: /s/ Robert E. Riojas
Robert E. Riojas
Attorney for Plaintiff
rriojas@riojaslawfirm.net
State Bar No. 00791531
2035 Grant Avenue
El Paso, Texas 79930
Telephone (915) 301-7819
Facsimile (915) 759-8665

EXHIBIT 7

CAUSE NO. DC-21-05961

EDWARD SENCLAIR,

Plaintiff(s),

v.

GIGG EXPRESS, INC., et al,

Defendant(s).

§
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§
§
§
§

IN THE DISTRICT COURT

DALLAS COUNTY, TEXAS

44TH JUDICIAL DISTRICT.

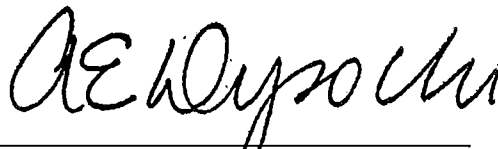
STATUS CONFERENCE ORDER

Please be advised that the above-referenced matter is hereby set for a status conference/dismissal hearing at:

9:00 a.m. on June 25, 2021

Failure to appear at this hearing may result in the dismissal of this matter for want of prosecution pursuant to Texas Rules of Civil Procedure 165a and the Court's inherent power.

Signed this 12th day of May, 2021.



JUDGE PRESIDING

EXHIBIT 8

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: GIGG EXPRESS, INC.
BY SERVING ITS REGISTERED AGENT PROCESS AGENT SERVICE COMPANY
INC. C/O JEFFERY SCHULTZ
1221 MCKINNEY, SUITE 4300
HOUSTON, TX 77010**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **44th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **EDWARD SENCLAIR**


Filed in said Court **10th day of May, 2021** against

GIGG EXPRESS, INC., RAVEESH

For Suit, said suit being numbered **DC-21-05961**, the nature of which demand is as follows:
Suit on **MOTOR VEHICLE ACCIDENT** etc. as shown on said petition, a copy of which accompanies this citation.
If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 19th day of May, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By , Deputy
TERESA JONES



**DALLAS
SERV
NO**

OFFICER'S RETURN

Case No. : DC-21-05961

Court No.44th District Court

Style: EDWARD SENCLAIR

vs.

GIGG EXPRESS, INC, et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____ .M. Executed

_____, within the County of _____ at _____ o'clock _____ .M. on

_____ day of _____, 20_____, by delivering to the within named

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date

actually traveled by me in serving such process was _____miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____

For Notary \$ _____

of _____ County, _____

By _____ Dep

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20 _____

to certify which witness my hand and seal of office.

Notary Public _____ Co

THE RIOJAS LAW FIRM, P.C.
A Professional Corporation

Robert E. Riojas
Licensed in Texas and New Mexico

2035 Grant Ave.
El Paso, Texas 79930
Telephone: (915)301-7819
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May 19, 2021

To: Dallas County District Clerk **VIA E-FILE**

Re: Citation Correspondence/ Fee

Style: *Edward Senclair vs. GIGG Express Inc. and Raveesh;*
Cause No. DC2105961 in the 44th Judicial District Court;
Dallas County, Texas.

Attn: Clerk of the Court:

This letter is to confirm our office's approval of an additional \$4.00 fee for a citation for the Secretary of State that our officed was asked to fulfill via e-file on 05/19/2021.

Of course, please call if you have any questions.

Sincerely,

By: /s/ Robert E. Riojas
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